CLEAN WATER ACT- FIELD AUDIT INSPECTION

Hydro Extrusion North America
330 Elmwood Ave
Mountain Top, PA 18707

Identification Number: PAP245985

Inspection Date: June 26, 2019

EPA Representative: Aaron Thomson
Environmental Engineer
Enforcement and Compliance Assurance Division
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Facility Representative: Brian Schmidt
HSE & WWT Manager
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Overview

On June 26, 2019, the Environmental Protection Agency (EPA) Region III Enforcement & Compliance Assurance Division (ECAD) conducted an Industrial User (IU) Pretreatment Program Field Audit Inspection of Hydro Extrusion North America (the Facility), located in Mountain Top, PA.

Opening Conference

EPA Inspector Aaron Thomson (EPA Inspector) arrived at the Facility at 11:00 AM. Brian Schmidt, the HSE & WWT Manager of the Facility, received EPA Inspector upon arrival. The EPA Inspector presented his credentials to Mr. Schmidt. An opening conference was conducted by the EPA Inspector. The EPA Inspector briefly explained the scope and time frame of the inspection.

Pretreatment Program Review

Starting with the pretreatment program review, the EPA Inspector requested Mr. Schmidt provide a background and description of the Facility, including major upgrades. According to Mr. Schmidt, the Facility had previously been owned by Indalex Aluminum Solutions, which sold the company to Mideast Aluminum who then sold the company to Sapa Extrusion. In October 2017, Hydro Extrusion North America acquired the property from Sapa Extrusion. The Facility is a metal processing facility offering extrusion, machining, fabrication and finishing services. Mr. Schmidt stated that during the life of the facility, processes were added, such as an aluminum anodizing process in the 90's, which was paired with a pretreatment process. Similarly, in the mid 90's a chromate line had been added along with another pretreatment process, however, both have been offline for more than 10 years with no intent of bringing them back online.

Mr. Schmidt provided a permit issued by the Mountaintop Area Joint Sanitary Authority (MAJSA) to the Facility on 11/28/18, effective 12/1/18 and expiring 11/30/21. The permit identification number associated with the Facility is PAP245985.

The EPA Inspector then asked Mr. Schmidt to describe the operations, in relationship to the Facility's shifts and personnel. Mr. Schmidt stated that there are typically two shifts per day in which discharge would occur (discharge would occur in a controlled batch). The shifts, during the week, occur from 5:45 AM to 3:45 PM and from 3:45 PM to 1:45 AM. During the weekends, the shifts are from 5:45 AM to 5:45 PM and then 5:45 PM to 5:45 AM. During these shifts, a wastewater supervisor and operator are always on shift. There is a wastewater treatment system installed to monitor the operations of the pretreatment processes. Mr. Schmidt stated that, if for whatever reason, no one was able to be present to monitor the pretreatment system, the Facility would limit the processes that contribute to the wastewater stream and would stop discharging until a wastewater supervisor/operator would become available. If an issue arose, the Facility would contact the MAJSA immediately.

The EPA Inspector asked Mr. Schmidt to describe the industrial processes that contribute to the wastewater discharged to the publicly owned treatment works (POTW), as well as the sampling practices associated with those discharges. Mr. Schmidt stated that everything in their

processes is collected and goes through their pretreatment, except the sanitary water. This includes water used in their cooling towers, their boilers, process water from extrusion pits (used to cool the metal, which is collected), some cleaning processes including degreaser with high BOD, and overflow from their anodizing pit. All water is collected in various trenches and is pumped to the wastewater treatment room, to enter a series of treatment tanks. The water is pH adjusted, floc is added, and sludge is allowed to settle before the pH is measured again and the operator allows the water to be discharged to POTW.

The sampling point is located after the wastewater treatment process. Mr. Schmidt stated that pH and flow are monitored continuously, with the continuous pH probe calibrated daily and the flow meter calibrated annually. pH and flow samples are collected and monitored daily. All other permitted parameters are sampled for weekly in bottles prepared, with preservatives, and collected by Hawk Mountain Labs out of West Hazleton, PA, which has a turnaround time of 1-2 weeks. These monthly results, as well as daily pH min/max, and daily volume discharged, are reported to MAJSA on no less than a monthly basis.

The EPA Inspector completed the field audit checklist (Attachment #1). Mr. Schmidt provided the information contained in the checklist.

Facility Site Visit

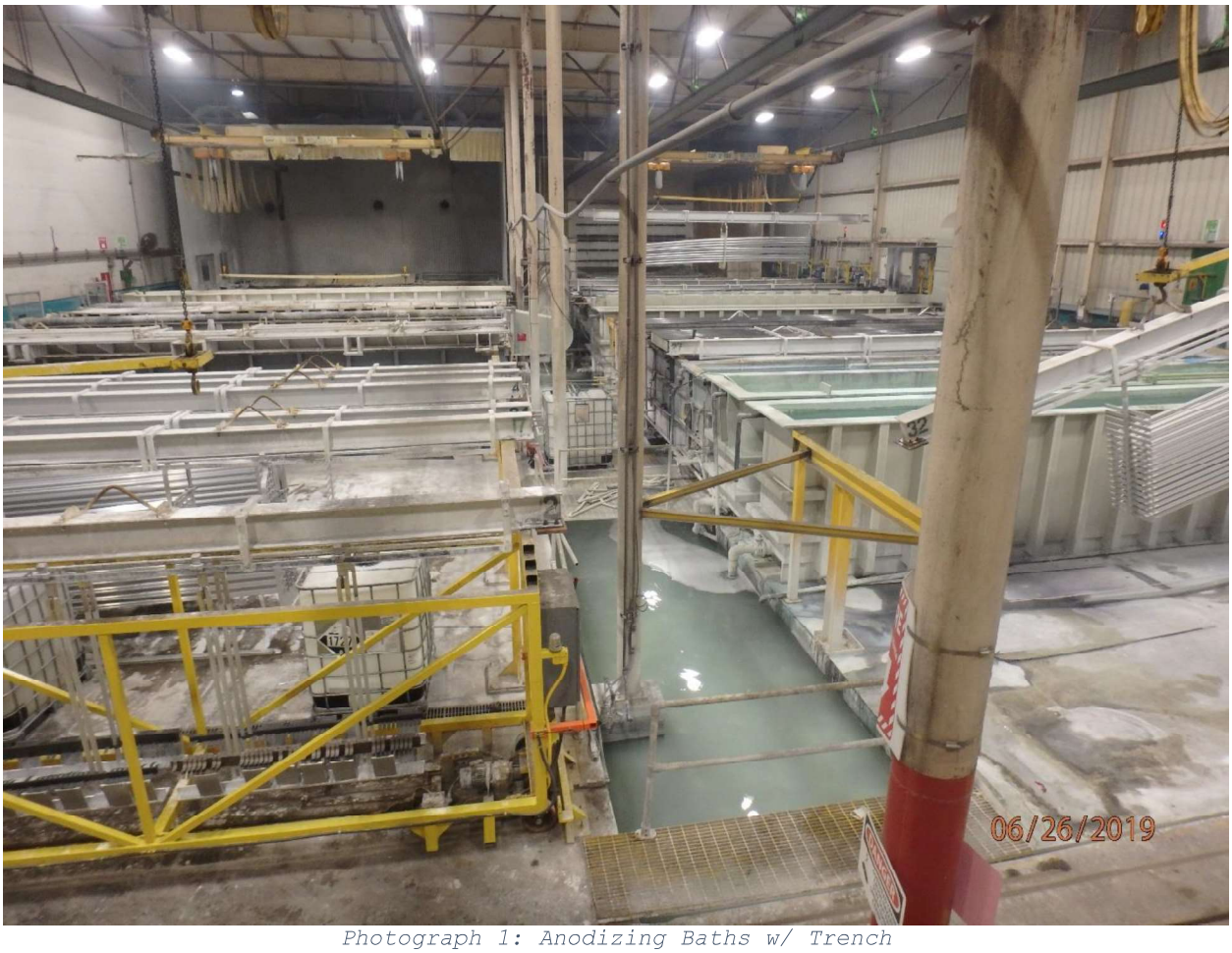
Mr. Schmidt lead the EPA Inspector on a tour of the Facility starting at 12:30 PM. First, the EPA Inspector was led to metal forming areas metal would be extruded and water would be used to cool the extruded metal. The EPA Inspector observed trenches at these areas to collect process wastewater. The EPA Inspector was the led to rinse baths (Photograph 1) used in the metal anodizing process. Processed metal is dipped in charged acid baths as part of the anodizing process. In between each of the chemical baths, the metal is dipped into a water bath to rinse it off. This water, as well as any overflow water, is collected in a trench and pumped to treatment tanks. The EPA Inspector was then led to the wastewater treatment system, starting with the treatment tanks. First, the wastewater enters a treatment tank (Photograph 2) where pH is measured, and the operator manually adjusts the pH by adding acid or base. Mr. Schmidt mentioned that they were looking into automating the pH adjustment. From here, the wastewater enters a settling tank (Photograph 3) where floc is added, and solids are allowed to settle. The third tank (Photograph 4) is a sludge settling “clarifier” and Mr. Schmidt stated that if conditions (pH, solid content) is not within acceptable limits, the operator can direct the flow of wastewater from this point back to the beginning of the pretreatment train. The EPA Inspector observed an ISCO continuous sampler and a flow meter after the “clarifier.” The continuous sampler included a log book and thermometer in the refrigerated section of the sampler. The EPA Inspector asked Mr. Schmidt to describe a typical sampling event. This concluded the Facility tour.

Closeout Conference

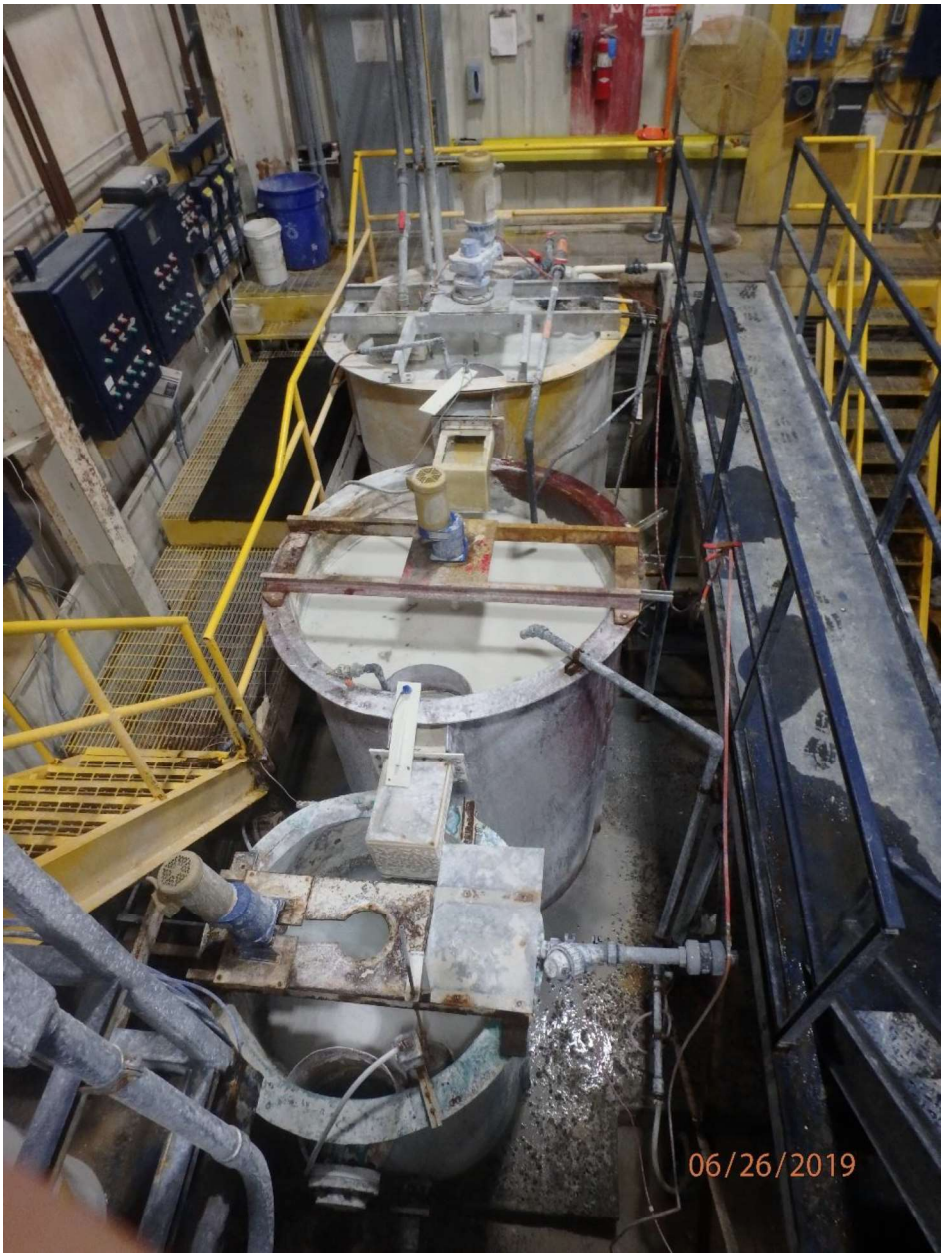
During the closeout, the EPA Inspector communicated inspection observations to the Facility. The EPA Inspector then stated that any outstanding concerns, questions or information regarding the inspection should be communicated to the EPA Inspector by Friday, July 12th, 2019.

Photographs:

Photographer: Aaron Thomson
Camera: Olympus Stylus TG-870



Photograph 1: Anodizing Baths w/ Trench



Photograph 2: pH Tanks

Photograph 3: Floc Addition Tank

Photograph 4: Sludge Settling "Clarifier" Tank